

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Package Service (FCPS)
Service Standard Changes, 2021

Docket No. N2021-2

PUBLIC REPRESENTATIVE'S SECOND SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS THOMAS J. FOTI
(PR/USPS-T-3)

(July 16, 2021)

Pursuant to 39 C.F.R. §§ 3020.117 and 3020.118, the Public Representative hereby submits the following interrogatories and requests for production of documents. Please refer to the testimony of Witness Thomas J. Foti.¹

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or questions of clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,
/s/ Mallory L. Smith
Public Representative for
Docket No. N2021-2

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¹ See Direct Testimony of Thomas J. Foti on Behalf of the United States Postal Service (USPS-T-3), June 17, 2021.

1. Please refer to the 10-year Plan, Delivering for America.² The Postal Service states that “[o]nline sales have surged while shipping durations have been reduced. In [Fiscal Year (FY) 2020], shipping customers selected 1- or 2-day service for 72 percent of their parcel shipments. We estimate that this could be as high as 90 percent by 2025” (footnote omitted). *Id.* Please also refer to USPS-T-3 at 7, lines 21-22 and at 8, line 1. Witness Foti states that based on the First-Class Package Service Transit Commitment (FTC) Survey “after the proposed changes to [First-Class Package Service] service standards, we expect that we will maintain current [First-Class Package Service] volumes due to our highly competitive prices and improved reliability in meeting service expectations.”³
 - a. Please confirm whether the reduction in shipping durations described in the Postal Service’s Strategic plan cited above also includes First-Class Package Service.
 - b. If question 4.b is not confirmed, please explain.
 - c. If question 4.b is confirmed, please explain how the statement in the Postal Service’s Strategic Plan, *i.e.*, that there will be increased consumer demand for shorter shipping durations, is not contrary to Witness Foti’s testimony that First-Class Package Service volume is expected to be maintained despite increases to shipping durations under the proposed service standard changes.

² See United States Postal Service, Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence, March 23, 2021 (Postal Service’s Strategic Plan), at 22, available at, https://about.usps.com/what/strategic-plans/delivering-for-america/assets/USPS_Delivering-For-America.pdf.

³ The Colography Group’s “First-Class Package Service Transit Commitment Survey,” Apr. 2021.